

*United States Attorney
Southern District of New York*

April 22, 2020

VIA ECF

The Honorable Denise L. Cote
United States District Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 1610
New York, New York 10007

Re: *United States v. Mahmoud Thiam*, 17 Cr. 47 (DLC)

Dear Judge Cote:

The Government writes to correct an error in its Memorandum in Opposition to Thiam’s motion pursuant to Section 3582(c) filed yesterday. The Government’s Memorandum incorrectly stated that Thiam “has served well less than half of his sentence.” (Gov’t Mem. 22). That is not correct. As the Government correctly stated, Thiam’s projected release date per the BOP is November 30, 2022, meaning that he has more than two-and-one-half years remaining on his sentence. (Gov’t Mem. 3, 23). Thiam has been in custody since his arrest on December 13, 2016, a total of approximately three years and four months.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

By: //s//
Elisha J. Kobre
Christopher J. DiMase
Assistant U. S. Attorneys
(212) 637-2599/2433

ROBERT ZINK
Chief, Criminal Division, Fraud Section
United States Department of Justice

By: _____/s/
Lorinda Laryea
Assistant Chief
Telephone: (202) 353-3439

cc: Jonathan Edelstein, Esq. (via ECF)